

November 17, 2004

H.W. Lochner, Inc.
Attention Kim Clark
310 East 4500 South Suite 600
Murray, UT 84107

Ladies and Gentlemen

SUBJECT SR-12

I am a student at Escalante High School and a resident of Boulder. I travel on Highway 12 at least two times every day to and from school.

The scene on the highway is very beautiful, but we still need to be safe for the school students who ride this road everyday. The road needs to be widened, the shoulders need to be wider, and we need more pull offs. Tourists who drive through here stop right in the middle of the road to take pictures because they are afraid of parking near the edges. This makes the travel of commuters and students unsafe. Rocks slide when ever it rains and fall in the middle of the road making travel dangerous and difficult.

Thank you for your understanding.

Sincerely



Sieta LeFevre
P.O. Box 1419
Boulder, UT 84716

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H.W. Lochner, Inc.
Attention Kim Clark
310 East 4500 South Suite 600
Murray, UT 84107

Ladies and Gentlemen

SUBJECT Highway 12

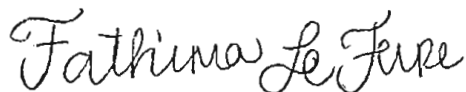
As a student from Boulder I travel the bus twice a day Monday through Friday to go to Escalante High School. Here are a list of my concerns.

First of all would be safety for students, parents, who travel to and from work. We need more guard rails for protection. We need a separate lane for bikers. They are very hard to see, especially when going around curves.

Something should be done about falling rocks. While going to school, our bus driver stops and picks up rocks so it won't hurt others who travel the road that day. It makes us late for classes. We need to have more scenic turn offs for tourists who want to take pictures and look at the view. That way they won't park in the middle of the road and hold up traffic behind them.

Thank you for your consideration.

Sincerely



Fathima LeFevre
P.O. Box 1419
Boulder, UT 84716

Something should be done about falling rocks. While going to school, our bus driver stops and picks up rocks so it won't hurt others who travel the road that day. It makes us late for classes.

November 17, 2004

H.W. Lochner, Corp.
Attention Kim Clark
310 East 4500 South Suite 600
Murray, UT 84107

Ladies and Gentlemen

SUBJECT Highway 12

My experience with Highway 12 is considerable. I travel to Escalante for school two times a day, sometimes even four. I also have to travel Highway 12 when leaving town for shopping or visiting relatives.

Automobile travelers and bicyclists don't use good judgement. Bicyclists ride in the middle of the road because they are afraid of falling off and ignore fellow travelers who would like to pass them. Tourists are always stopping in the middle of the road to get a better view or crawling at speeds so slow they hold up traffic.

I think it would be beneficial to have the road worked on. We should not fix only some of the potholes and dips, but we should also widen the road, build more turn offs for tourists, and add a passing lane in some areas. Some speed signs should be changed to a more appropriate speed to help the flow of traffic, and reflectors should be placed on more signs so they aren't mistaken for wildlife.

I appreciate your time and hope you will help keep Highway 12 safe for all its travelers.

Sincerely



Elizabeth Fischer
P.O. Box 1398
Boulder, UT 84716

I think it would be beneficial to have the road worked on. We should not fix only some of the potholes and dips, but we should also widen the road, build more turn offs for tourists, and add a

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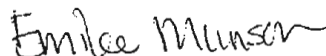
H.W. Lochner, Inc.
Attention Kim Clark
310 East 4500 South Suite 600
Murray, UT 84107

Ladies and Gentlemen

SUBJECT S.R. 12

I am a resident of Escalante, located along Highway 12. Every week I travel to neighboring towns Boulder, Tropic, and Panguitch. I feel that the roads are too narrow from Escalante to Boulder. It makes me feel unsafe to pass another vehicle along that section of road. The road should be widened, and the shoulder of the road should be wider. This will give tourists room to pull off and enjoy the area without still being in the road.

Sincerely



Emilee Munson
45 E. 200 N.
Escalante, UT 84726

Boulder. It makes me feel unsafe to pass another vehicle along that section of road. The road should be widened, and the shoulder of the road should be wider. This will give tourists room to pull off and enjoy the area without still being in the road.

November 17, 2004

H.W. Lochner, Inc.
Attention Kim Clark
310 East 4500 South Suite 600
Murray, UT 84107

Dear H.W. Lochner, Inc.

SUBJECT SR-12


I am a 16-year-old student at Escalante High School and also a resident of Boulder. Everyday I travel across SR-12 at least two times. Anytime I leave school or home, to get groceries or supplies, I have to travel on that road.

People who travel across the road for the first time have some trouble. They feel it is too dangerous, so they drive at least 10 MPH under the speed limit. It would be nice if you could make more pull offs for the tourists so they aren't slowing traffic down. Fixing some of the shoulders so they aren't just drop offs would help tourists and residents. Taking all the potholes and bumps out of the road would make it a nicer trip.

On the other hand, I don't think that you should do anything that will affect the scenic view or the historical memory of the road. The road represents something for the people who have lived here for many years. Adding a bike trail would be a good thing in some ways, but it might also take away from the road's beauty and history.

I hope this letter will influence your decisions on the improvements on the road.

Sincerely


Jessica Corderman
1285 West Hwy. 12
Boulder, UT 84716

On the other hand, I don't think that you should do anything that will affect the scenic view or the historical memory of the road. The road represents something for the people who have lived

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H.W. Lochner, Inc.
Attention Kim Clark
310 East 4500 South Suite 600
Murray, UT 84107

Dear Lochner, Inc.

SUBJECT S.R.-12

Though I travel Highway 12 rarely, I am still concerned with its hazards. Highway 12 is very unsafe for the many visitors and even locals who use that road every day. I think work on this road would not only be beneficial to tourists but to residents as well.

The roads and the shoulders should be made wider. A passing lane should be added for locals who may drive faster than tourists. I want to preserve the environment and scenic views, so make only changes that are absolutely needed to make this road a more safe and enjoyable traveling experience.

Sincerely

A handwritten signature in dark ink, appearing to read "Julie Eckert", with a long, sweeping horizontal line extending to the right.

Julie Eckert
25 South 100 West
Escalante, UT 84726

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H.W. Lochner, Inc.
Attention Kim Clark
310 East 4500 South Suite 600
Murray, UT 84107

Ladies and Gentlemen

SUBJECT Highway 12

I am a student at Escalante High School and a resident of Boulder. I have to travel on Highway 12 to and from school (30 miles both ways) sometimes as many as four times a day. I also have to travel on Highway 12 to leave town, so my experience on Highway 12 is considerable.

I think there should be more pull-offs. This way, tourists who are scared can pull over to let others by if they insist on going slow. It would also be safer for other travelers if tourists had a place to pull off to take pictures instead of parking in the middle of the road.

I don't, however, think you should make the road wider. People have been traveling Highway 12 the way it is for years, and there haven't been many problems. Highway 12 is beautiful, and some people come to this area just for the scenery. Making the road wider would ruin some of the road's beauty.

Sincerely

Kari Heaton

Kari Heaton
Box 1431
Boulder, UT 84716

others by if they insist on going slow. It would also be safer for other travelers if tourists had a place to pull off to take pictures instead of parking in the middle of the road.

November 22, 2004

H.W. Lochner, Inc.
Attention Kim Clark
310 East 4500 South Suite 600
Murray, UT 84107

Ladies and Gentlemen

SUBJECT SR-12

I have been a citizen of Escalante for 17 years, and travel SR 12 every other weekend. There are many things I think need changes or improvements:

- Not enough turn-outs
- Need more passing lanes
- Better maintenance
- Wider shoulders
- Wider lanes
- More guards around sharp corners
- Signs without reflectors that don't look like elk in Upper Valley

Thank you for listening about my concerns.

Sincerely



Amanda Porter
P.O. Box 109
Escalante, UT 84726

- Wider lanes
- More guards around sharp corners
- Signs without reflectors that don't look like elk in Upper Valley

November 22, 2004

H.W. Lochner, Inc.
Attention Kim Clark
310 East 4500 South Suite 600
Murray, UT 84107

Dear Lochner, Inc.

SUBJECT SR-12

I live in Escalante, Utah, and travel through Boulder often. The road is okay for people who travel it often, but for tourists it is a different story. They do not like to drive it. They are always driving too slow, and they drive right in the middle of the road. They are always wanting to take pictures and there are not very many pull-outs, so they stop in the road, which is very hazardous.

It is a good idea to fix this road because it is extremely dangerous. I know it will take time to fix and there will be some delays, but it will be worth it in the end.

Sincerely



Chad Cottam
PO Box 244
Escalante, UT 84726

pictures and there are not very many pull-outs, so they stop in the road, which is very hazardous.

It is a good idea to fix this road because it is extremely dangerous. I know it will take time to fix

November 22, 2004

H.W. Lochner, Inc.
Attention Kim Clark
310 East 4500 South Suite 600
Murray, UT 84107

Dear Lochner, Inc.

SUBJECT Highway 12

I live in Escalante, Utah. In order to go to any other town, I must travel on Highway 12. Escalante, as you know, is in the middle of Highway 12, so I travel this road quite often. I drive this road for both school oriented and for personal reasons.

There ought to be more pull-outs for tourists because we live in a beautiful area, but the road needs to be used for driving, not parking. This area is heavily populated with wildlife, and signs can be mistaken for wildlife. More reflectors ought to be placed on the signs. These are a few things I have noticed.

Thank you for your time.

Sincerely

Dallen Shakespear

Dallen Shakespear
Box 29
Escalante, UT 84726

There ought to be more pull-outs for tourists because we live in a beautiful area, but the road needs to be used for driving, not parking. This area is heavily populated with wildlife, and signs can be mistaken for wildlife. More reflectors ought to be placed on the signs. These are a few

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H.W. Lochner, Inc.
Attention Kim Clark
310 East 4500 South Suite 600
Murray, UT 84107

Dear Lochner, Inc.

SUBJECT Highway 12

For the last four months I have been driving Highway 12. From Panguitch to Escalante, the road gets bad, but from Escalante to Boulder gets worse. The shoulders are very narrow; the road also has holes and bumps in it. There have been many wrecks on Highway 12; it is a very dangerous road. It needs to be improved.

Sincerely

Derek Woolsey

Derek Woolsey
P.O. Box 251
Escalante, UT 84726

gets bad, but from Escalante to Boulder gets worse. The shoulders are very narrow, the road also has holes and bumps in it. There have been many wrecks on Highway 12; it is a very dangerous road. It needs to be improved.

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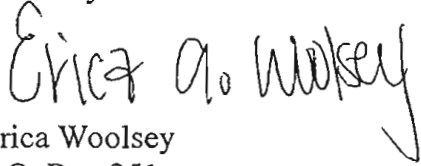
Dear Lochner, Inc.

SUBJECT SR-12

My life is spent on a bus. This means that I travel SR-12 more times a year than most people. This road needs wider shoulders, more pull outs, and wider lanes. The people who travel this road have various complications with tourists. Tourists drive slower to look at the scenery, bike SR-12 and take the middle of the road, and they park in the road to take pictures. The people who live here have destinations to reach.

Many tourists travel this road once or twice in their life. They may say that it will ruin the scenery if we fix such problems. They don't understand that it complicates our lives and endangers their safety when these problems don't get fixed.

Sincerely



Erica Woolsey
P.O. Box 251
Escalante, UT 84726

who live here have destinations to reach.

Many tourists travel this road once or twice in their life. They may say that it will ruin the

November 22, 2004

H.W. Lochner, Inc.
Attention Kim Clark
310 East 4500 South Suite 600
Murray, UT 84107

Ladies and Gentlemen

SUBJECT Highway 12

My experience with Highway 12 has usually been favorable, but I know it's getting worse because we have had many more car wrecks, injuries, and fatalities each year.

UDOT needs to make the road wider so it is safer for locals and tourists. I suggest widening the road for more pull offs so people don't have to worry about going too slow because it's so narrow.

Thank you for considering my viewpoints.

Sincerely



Jordan Carter
255 North Reservoir Road
Box 275
Escalante, UT 84726

UDOT needs to make the road wider so it is safer for locals and tourists. I suggest widening the road for more pull offs so people don't have to worry about going too slow because it's so narrow.



Jim Catlin
68 South Main Street, Suite 400
Salt Lake City, Utah 84101

December 23, 2004

Dear Mr. Catlin,

It was a pleasure speaking with you. The SR-12 Project Team truly appreciates your interest in, and commitment to, participating on the SR-12 Context Sensitive Committee (CSC). As we discussed, the Utah Department Transportation developed this Committee to provide an additional resource for valuable input and ideas during the safety improvement studies along SR-12 from Escalante to Boulder in Garfield County.

The CSC is vital to this project as it offers an innovative way to maintain open and honest channels of communication between major interest groups and the SR-12 Project Team. As you know, the SR-12 corridor is one of the most unique and beautiful in the country – and critical in serving both the local communities and the visiting public. It is important for the Project Team to understand the context of the area from many perspectives. Therefore, the Project Team sees this group acting, in part, as a “focus group” representing the sensitive environmental, municipal, public, regulatory, recreational, and transportation issues as a whole. As each committee member brings an understanding of various interests, you will act as a representative of your respective group. The Project Team strongly believes every voice must be heard. We encourage all members to actively participate in the committee meetings and voice any ideas, questions, or concerns that you may have regarding any aspect of this important project.

Representatives from the following interest groups have been invited to be members of the CSC:

Boulder City
Escalante City
Garfield County Travel Council
Ranching Community
US Bureau of Land Management/Grand Staircase-Escalante National Monument
Federal Highway Administration
Utah Department of Transportation
Escalante and Boulder Chamber of Commerce
Wild Utah Project
Southern Utah Wilderness Alliance
Bicycling Community
Garfield County School District
Garfield County Businesses

The Project Team is excited about the initiation of this committee and the opportunities it provides to participate in the transportation decision-making process. We have attached the following information for your reference, and to make your participation easier and more productive:

- Project Information Sheet – provides a brief description of the project study process;
- Project Map – identifies the project area and major resources;
- Project Glossary – lists common project terms and definitions;
- NEPA Information Card – defines the National Environmental Policy Act;
- Context Sensitive Solutions Card – provides concepts for Context Sensitive Solutions and design;

- Draft CSC Charter – provides a draft outline of the initiative, mission, and goals for the Committee;
- Project Questionnaire – page three of this document, please fill out and send back in the self-addressed stamped envelope provided

Please note that the CSC Charter included is a **draft** to be discussed with each CSC Member and then finalized at the first CSC meeting for signatures. The draft includes the foundation for the CSC's initiative, mission, and goals. They include assisting the Project Team with the development of the project area context and the "Purpose and Need" statement. In addition, the CSC will provide feedback on comments received to date from the public as well as provide additional information and insight.

The CSC will assist in developing a project vision and evaluation criteria. Members will also brainstorm various safety improvement alternatives that are consistent with the purpose and need and are compatible with both the natural and built environments.

In order to fully understand and appreciate the context of this project, the Project Team has determined that committee meetings should be held within the vicinity of the project. Therefore, all CSC meetings will be alternately held in Escalante and Boulder. It is anticipated that the first CSC meeting will be held during the first week of February. Exact times, dates, and locations will follow this letter.

We have scheduled a meeting with you on January 14, 2005, to further discuss your selection for this important endeavor. I look forward to meeting with you on the 14th to discuss the committee, the enclosed materials, and your interest in the project.

If you have any questions, comments, or concerns, please feel free to contact either of us. Thank you for your time and we look forward to working with you.

Sincerely,

Michelle Fishburne, PE
SR-12 CS Committee Co-Facilitator
HW Lochner, Inc.
310 East 4500 South, Suite 600
Salt Lake City, Utah 84107
(801) 262-8700
mfishburne@hwlochner.com

Kim Clark, PE
SR-12 CS Committee Co-Facilitator
HW Lochner, Inc.
310 East 4500 South, Suite 600
Salt Lake City, Utah 84107
(801) 262-8700
kclark@hwlochner.com



Name:

☐ Mail
☐ Phone Call
☐ Email (Address: _____)
☐ Other _____

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

Boulder Regional Group
P O Box 1455
Boulder, Utah 84716
brgutah@yahoo.com
435-335-7477

INTERESTED PUBLIC NOTIFICATION and COMPLAINT

DATE: February 24, 2005

To: Randi A. Shover with H.W. Lochner, Inc
310 East 4500 South, Suite 600
Salt Lake City, Utah 84107 (801) 262-8700 rshover@hwlochner.com

Dear Ms. Randi Shover,

I appreciate very much being able to finally contact you by telephone to try to understand what has been occurring this week and the past several months concerning the UDOT Highway 12 Environmental Assessment (EA) being conducted within the Grand Staircase Escalante National Monument (GSENM). The Boulder Regional Group (BRG) is located within the project area.

As you know, Lynne Mitchell of BRG sent an email to you earlier this week asking if there was some kind of a meeting being held this week in Escalante, Utah regarding this project. She did this after hearing a rumor that there would be a meeting. Without the rumor and a subsequent email to you we would still know nothing about the meeting or the formation of some kind of an advisory committee. Unfortunately you, nor anyone with the Lochner staff were able to check the emails directed to your office using your own Highway 12 website this week so BRG was never informed and subsequently unable to attend a meeting held right here in our own area and project location.

There was also no information about this meeting (or formation of a committee) posted on either of the town bulletin boards in Escalante or Boulder, although this particular portion of the Highway 12 project area is located between our two small towns. Lochner also failed to send out any emails to the public or BRG that there was a meeting although you did send an email a couple of weeks ago touting your website as the place for us to keep informed. Your website(s) provided no notice of any meetings, lists no phone contact information (so we could phone and find out about the meeting), has nothing about selecting any working group committee, or a process to pick or nominate members for the committee. The websites indicate they were "Last Updated November 24, 2004" meanwhile there has evidently been plenty occurring that the public should have been fully informed about.

We have reviewed the website(s) weekly since last fall, especially the past 10 days looking and waiting for some kind of notification about any meetings. I personally told Ms. Mitchell that if there was going to be a meeting that she merely needed to monitor the website and check in-coming emails at brgutah@yahoo.com to know if the rumor of any meeting was true. I was wrong because I depended on your **Notice to the Public** (required by Advisory Committee regulations and NEPA) and/or notice to our BRG email or phone number since we have provided the information prior as we made it known to everyone we could that **BRG is an interested public in this project. If there is any question as to our standing, we formally reiterate our status by way of this letter.** After all, BRG did file comments to the GSENM EA the last time UDOT tried to blast out a section above Calf Creek Falls. In fact, that poorly conducted EA would have already been implemented had it not been for our filing an Appeal to the Interior Board of Land Appeals (IBLA) in conjunction with the Escalante Wilderness Project (EWP) to force GSENM to withdraw the EA and stop this disaster. We demanded then and continue to demand that UDOT and GSENM prepare an Environmental Impact Statement (EIS) for the entire length of the Highway 12 prior to any more piecemeal destruction of

our scenic natural resources. Given UDOT has already decided to reduce the project to an EA for only a short portion of Highway 12, we still maintain, under NEPA, it must be an EIS for the entire length of this designated Scenic Highway. Given the unacceptable illegality of what has already been occurring since this project was noticed to the public, especially formation of a working group and lack of public knowledge, BRG hereby informs Lochner, UDOT, and GSENM that UDOT needs to start again. **You informed me today that the idea was to wait until later to decide if it should be an EA or an EIS but we are informing you and UDOT in writing that when you do decide, we firmly believe you must again formally place a new notice of an EIS to the public.** UDOT, working with GSENM should have already researched the need for an EIS prior to a Notice.

Lochner and UDOT failed to inform BRG or the local public that there was a 12 person committee being formed to advise UDOT on preparation for the EA/EIS. You told me today over the phone that an employee consultant of Lochner, Stephen Trimble was assigned to chose which environmental organizations would be allowed membership on the committee. You said I should call Mr. Trimble, Southern Utah Wilderness Alliance (SUWA), and Wild Utah Project for information and input about the committee but when I did, no one was in their offices. Subsequently, BRG has not yet been able to speak with anyone but you and I will be in the field (GSENM) tomorrow (Friday) through Sunday so I am writing this letter and emailing it with no input from Mr. Trimble or the chosen Wasatch Front environmental groups. I have been designated by EWP and now decided to lead the BRG effort on this project and inform you now that this sort of selection process is unacceptable.

Mr. Trimble, a paid consultant of Lochner who attended the prior UDOT open house meetings as an official representative, requested and was sent several months ago, photo copies of our prior above mentioned EA appeal and comments that halted the wrongful construction/destruction near the famous “Hogsback” section of highway 12 a few years ago. BRG and EWP’s appeal was the primary reason there is an environmental assessment (EIS) process being conducted now. Mr. Trimble knew fully of our strong continued interest but failed to ever contact us again about membership on the committee or this meeting. Have there been other meetings held during the past that were similarly not noticed to the public? It appears to us that he and others merely wanted to say they contacted BRG and then find other groups to avoid allowing us to have direct input in a working group setting. Did members of the other groups attend Open House Meetings or initially contact Lochner to express their interest? Were there nominations taken and what were the criteria for membership? BRG and EWP resent the implications that since we are not based in Salt Lake City, we must now be forced to work through these organizations to access information and have input on this important committee. It seems that all of the other members of the committee are proponents for growth, change, and monetary gain, whether they are state, federal, and local government representatives or eco-tourism proponents. BRG has been a local organization for the past 20 years, shown interest in these local UDOT projects yet Lochner and others apparently have made a unilateral decision to exclude our direct input. WUP and SUWA never filed appeals on the past “Hogsback” work and are not locally based yet they have already been selected to participate.

We at BRG find all of the above to be unacceptable. More or less secret meetings not noticed to the public, no way to reasonably communicate to organizers—even using their websites, no notice to interested public, arbitrary selection of working group membership, etc. Please keep us informed of all decisional and non-decisional planning and other activities regarding this project. As we have already expressed repeatedly in the past, we particularly want to be present at any tours of the road.

Thank You, Julian Hatch for Boulder Regional Group

CC: EWP, UDOT, Stephen Trimble, SUWA, GSENM, (and others)



southern
utah
wilderness
alliance



March 24, 2006

Re: Comments on the proposed SR12 project

Submitted jointly by the Southern Utah Wilderness Alliance and the Wild Utah Project.

Project Supervisors:

Thank you for giving us the opportunity to participate in the Context Sensitive Committee (CSC). As we understand it, the purpose of convening this committee was to get input from stakeholders and incorporate that input into the planning process. The formation of the CSC is an acknowledgement of the fact that this is no ordinary highway, that in fact its context was a very important aspect of its functionality.

Our interest in this project falls into two categories.

First, we want to make sure that no part of this project interferes with lands proposed for wilderness designation. A large part of SR-12 between Boulder and Escalante borders the Utah Wilderness Coalition's wilderness proposal – America's Redrock Wilderness Act. We are concerned that even improvements that do not physically infringe on the proposed wilderness lands could, nevertheless, have indirect impacts.

We recommend that UDOT apply for a right of way for this section of SR-12 using Title V of FLPMA. We recommend that this right of way be 100 feet from the center line of the highway on either side, and that modifications from the status quo be minimized and be limited to those that shall increase the public's safety along this route.

Further, we recommend that improvements along SR-12 enhance the wilderness experience for those using backcountry within view of the highway. For example, major concrete retaining walls on the Hogsback would be very visible to people walking in the canyons below. We would like to make sure that all necessary improvements are designed for low visual impact.

Second, we represent many people who travel on and love this stretch of road. SR-12 is an experience in itself, and the section under discussion is the most memorable portion. People enjoy the minimal influence and harmony with this remarkable landscape that the character of this road today conveys. We caution those promoting improvement that this character is a marked difference from the bland smoothness of the manicured, over engineered roads that comply with highway engineering standards. We seek to

preserve the road's rough edges, while still providing for the rectification of any problems that have proved a safety hazard.

Most of the options discussed by the CSC would have a fairly low impact on the character of the road. These include things like paving the road to the cliff base to provide a bike lane and putting up additional cautionary signs. More intrusive options, such as constructing a long bridge over the entire area or lowering the Hogsback, were greeted with groans from most of the CSC members. From the first day of meetings, the CSC held a general consensus that changes to the road should be unobtrusive.

The following are comments on specific topics or areas of concern.

Purpose Statement: As it currently exists, the statement of purpose for the SR-12 project does not include the goal of "maintaining the character of the road." However, this was one of the primary goals mentioned in some way by nearly every member of the CSC. It came out many times in notes and summaries of CSC discussions. It seems that, in addition to obvious purposes behind the project, maintaining the character of the road must be included. If the highway improvement team streamlines the road so much that it loses its character, they have failed in their mission. We request, once again, that "maintain the character of the road" be added to the purposes.

Each of the stated purposes for the project comes with a brief explanation of the context of that purpose. We suggest adding something like the following:

"4: Maintain the character of the road – This section of SR-12, perhaps more than any other state highway, allows the traveler to cross one of North America's most remarkable landscapes with a minimal roadway footprint. Its narrow curves hug the landscape, brushing against sandstone cliffs, skirting the sirocco formations that drop below, and gracefully crossing the rare perennial streams of these canyons. Some safety improvements are expected. However, to maintain the character of this roadway wherever possible modifications must occur within the area that is today impacted by the current highway. There might be some exceptions, say for a new pullout, but the general intent is to present little visual change to the road as improvements are made."

Wilderness Study Areas and Proposed Wilderness Areas: The conservation community advocates for protection of lands included in America's Redrock Wilderness Act. For this reason, conflicting uses and new impacts, whether by road reroutes, bike paths, or overlooks, will be opposed. Long stretches of this part of SR-12 are bordered by Wilderness Study Areas, which have very specific legal protection and, for practical purposes, are managed as wilderness areas. Other parts of the road are bordered by the Utah Wilderness Coalition (UWC) wilderness proposal. For the record, the UWC proposed wilderness areas are set back 100 feet from the center of the pavement for roads like SR-12 where no right of way exists. For roads where a right of way exists, the wilderness boundary is on the edge of that highway right of way.

Footprint

A footprint is an obvious way of measuring a road's impact. Improvements to SR-12 should whenever possible be kept inside the current disturbed area of the road. This means that no significant new grading, flattening or blasting should take place. To create bike lanes through road cuts, for example, we should pave up to the cliff line and put

culverts underneath the pavements, rather than blasting away sections of the cliff to create a new ditch.

Safety Standards

Safety is ostensibly the primary reason for road improvements. However, the data and analysis that this process provided concludes that the section of this road from Head of the Rocks to New Home Bench has fewer accidents than many other sections of SR-12, including those that are straighter, wider, and closer to highway engineering design standards. As a law enforcement officer agreed in his presentation to the CSC, it is less that the road is unsafe, and more that it is *perceived* to be unsafe, because of its steep sides and sharp curves. These obvious visual cues make people slow down and drive more carefully, thus resulting in fewer accidents. It is the same “traffic calming” principle used on busy urban roads where speeding is a problem. In the case of SR-12, it is quite possible that making the road *look* safer will actually result in more accidents. We should therefore resist the temptation to straighten curves and flatten grades simply because they seem dangerous, instead relying on accident data to see what areas of the road really need to be “improved.” Anything that makes noticeable changes to the character of the road should be given greater scrutiny, and performed only if they are absolutely necessary for safety concerns.

Widening or straightening the road to fit AASHTO standards would not be in keeping with the road’s character, and is in any case not required for roads where extenuating circumstances, such as rugged scenery, exist.

A number of accidents noted in the meetings involved collisions with wildlife and livestock, often at night. As this process revealed, at night, a typical car cannot drive faster than 45mph and see an animal soon enough to stop in time. For this reason, a 45 mph speed limit should be instituted in areas where large animals are often in the road at night.

Large trucks and RVs offer special problems especially on narrow roads. In the curvy section of the road, we recommend that the speed limit for large vehicles be 25 mph and that they be required to use turnouts to allow for faster vehicles to pass. This is an important safety consideration for bicycles using this road.

Scenic Considerations

Improvements to this section of highway need to improve the scenic character of the road. As mentioned earlier, oversized bridges, Jersey barriers, cliff cuts, and bare soil road cuts and fills must be avoided, and where they exist replaced with more suitable treatments. Stone walls made from native materials are recommended for retaining walls. An example of such retaining wall can be found on the stream side of the road about a quarter mile downstream from the Calf Creek Bridge. Several options were presented using different sprayed concrete retaining walls. The examples shown appear to be out of character with this landscape.

Bike paths/lanes

UDOT should generally avoid widening the curved sections of the road. However, in places where bikes may block traffic by going slowly uphill, and drivers may be tempted to pass them unsafely (by going into the opposite lane), UDOT should pave a four-foot-wide shoulder within the current footprint of the road. We are opposed to cliff removal

in order to make bicycle lanes. Bicycle lanes should be marked and have adequate signage. Here are a few more considerations when establishing uphill bicycle lanes:

- In narrow road cuts, the pavement could be extended to the foot of the cliff, with a drainage pipe laid underneath the pavement to channel runoff. This obviates the need for blasting into the cliff and changing the character of the road. In the few places where the roadway is too narrow to allow for an uphill bicycle lane, signs are recommended that warning drivers of bikes in the road. Since these areas are few (and only one of them, the stretch near the Boynton Overlook, is near a steep curve), there should be no reason to blast out cliffs to make room for bike lanes.
- Near the Hogsback, there are a couple of places where the road is so close to a steep cliff that there is very little room to widen the shoulder. In that case, UDOT should install a bike lane by widening the road within the current impacted area by use of retaining walls. These walls should be made of, or faced with, native stone, and can be on the upslope or downslope side of the road. If there is literally no room, UDOT should again install signs warning people of slow bicycles.
- Though the Cream Seller's route was discussed as a possible corridor for a separate bike path, further consideration has indicated that this is not a good idea for a number of reasons. Construction of a bicycle route would significantly damage the historic character of this route as it exists today. The route is currently quite rough, and would require extensive blasting, grading and possibly paving to be suitable for slippery road bike tires (most people riding SR12 probably use tires designed for pavement rather than dirt). Furthermore, part of the Cream Seller route goes through the UWC's wilderness proposal and the wilderness study area. UDOT would meet with significant opposition were any developments put into this area.
- New Home Bench may offer an opportunity for a separate path bicycle path. If UDOT can keep the path within the right of way or, on the east side, between the road and the wilderness study area boundary, this might be a good idea.
- There are several places where a bike lane could be installed by taking out the angle-of-repose piles of rubble that border the road, and instead putting in a retaining wall made of native stone. This would be more attractive, safer and relatively unobtrusive (as opposed to blasting out cliff sections to make room for bicycles).
- In places, particularly in Calf Creek Canyon, where the outside slope of the road is already unstable rubble, a retaining wall on the uphill side of the road made of native stone might make the road less prone to erosion.
- We should learn from the Highway 89 bicycle path north of Maryvale. This bicycle path was oversized and out of keeping with the scenic character of the canyon. The lanes are too wide and the impacted area from construction in some places over 150 feet wide. A bicycle trail can be just five feet wide and curve and dip to fit the existing terrain and avoid trees.

Passing and Turning Lanes and Turnouts

Again, since UDOT should discourage high-speed travel on this road, they should avoid putting in infrastructure that facilitates it. However, since RVs tend to block the road for locals who aren't there to sightsee, it may be helpful to put in a few turnouts. Passing lanes were analyzed and we concluded that these would need to have a significant length that requires excessive disturbance. These turnouts should be in the spots that are

naturally flat, so that their construction does not lead to major changes in the landscape. Here are a couple of ideas. There may be other locations that need to be considered:

- New Home Bench, as the first flat spot north of Calf Creek and the Hogsback, is a reasonable place for a few turnouts.
- The westernmost portion of the road, miles 61-69, is flatter, not up against a wilderness proposal boundary, and is long enough to allow people to pass one another. A warning that this is the last passing lane before a long slow section might be useful here.
- The lane turning into the Calf Creek Campground is a sharp turn if the driver is coming in from the north. However, since this spot has not been accident-prone, a sign warning drivers about the curve, and maybe some additional reflectors along the outer edge for night drivers, should suffice. Reengineering is not necessary.

Boynton Overlook

Members of the CSC noted that the Boynton Overlook is small and awkwardly placed for vehicles turning into the parking lot at high speeds. One suggestion was to blast out the cliff on the other side of the road, install a large parking lot with diagonal spaces, and paint a crosswalk to guide people across the highway. Such a construction would be in a place that requires removal a lot of sandstone and pose new dangers for pedestrians crossing this highway on a corner. The Boynton Overlook is bracketed by steep, tight curves in the road on each side. It is difficult for drivers to see very far ahead in that area. Installing a system that forces people to walk across the road would exacerbate an already dangerous situation. Expanding the existing overlook on the same side might be a good idea as long as it does not require removing more cliff.

Head-of-the-Rocks curve

There was one proposal to cut through the small curve above Head-of-the-Rocks to increase the design speed of the roadway just as it enters the switchbacks section. Accident data does not support this change. Improved signing, rumble strips, and speed transition zones make more sense.

Calf Creek Bridge

UDOT engineers are worried that the Calf Creek Bridge is situated in such a way that the creek is eating away at the pilings and making it unsafe. If this bridge is redesigned and placed differently, we ask that the bridge remain within the footprint now occupied by the road, and to the greatest extent possible blend in with the landscape. The bridge that now crosses the Escalante River is a good example of construction that is not within the character of the land and current highway. The new Escalante River bridge is excessively high, wide, visually dominated by wide unneeded paved shoulders, Jersey barriers, and high embankments. For the Calf Creek Bridge, UDOT must first try reinforcing the embankment, and only replace the bridge if it is unstable and not meeting vehicle weight requirements.

Thank you for the opportunity to make comments on proposed SR-12 improvements. We look forward to participating in the NEPA process. Please continue to send updates, as well as any future NEPA documents, to the addresses below. If you have

further questions, contact Liz Thomas at SUWA, 435-259-5440, or Jim Catlin at the Wild Utah Project, 801-328-3550.

Sincerely,

A handwritten signature in black ink that reads "Laurel Hagen". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Laurel Hagen
SUWA

Jim Catlin
Wild Utah Project



Garfield School District

145 East Center • P.O. Box 398 Panguitch Utah 84759 • phone (435) 676-8821 • fax (435) 676-8266

TO EMPOWER AND MOTIVATE LIFELONG LEARNERS

July 26, 2006

Walter Waidelich
Division Administrator
Federal Highway Administration
2520 West 4700 South, Suite 9A
Salt Lake City, UT 84118-1847

Dear Mr. Waidelich:

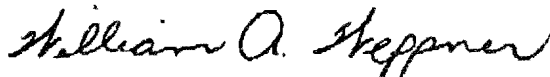
The Garfield County School Board strongly believes that the most precious natural resource in this county is our children. The Board has significant concerns over the proper maintenance of Utah State Highway 12 between Escalante and Boulder. The Garfield County School District is a public transportation carrier, moving children to and from multiple schools located along this highway. We believe appropriate maintenance by UDOT is required to ensure the safety of Garfield County school children being transported over this road twice a day, nine months of the year. Currently, all appropriate maintenance necessary for meeting established safety standards is not being accomplished because the Grand Staircase Escalante National Monument does not recognize or has not granted the necessary right of way to allow UDOT, at its sole discretion, to adequately maintain the highway. While the right of way issue is currently being discussed by the GSENM, the Federal Highway Administration, and UDOT, the timeline for resolution and action continues to put Garfield County school children at significant risk, denying them their right to a safe and well maintained school transportation route. The Garfield County School Board supports all of UDOT's right of way claims, and we are independently inventorying all safety issues along this stretch of State Highway 12.

Garfield County has been designated by the federal government as a low income population by meeting the U.S. Department of Human Health and Services poverty guidelines. As a public transportation carrier, the Garfield County School District is a public stakeholder that is directly impacted by the decisions and actions taken by the GSENM, the FHWA, and UDOT regarding safe transportation along this section of State Highway 12. Given these facts, the Garfield County School Board respectfully requests that the GSENM and FHWA immediately comply with Title VI of the Civil Rights

Act of 1964, Executive Order 12898, the DOT and FHWA Orders on Environmental Justice, the National Environmental Protection Act Order on Environmental Justice, and any other applicable law or regulation relating to this issue. Such compliance would include, but is not limited to, immediate involvement of the Garfield County School Board as a stakeholder in discussions regarding resolution of State Highway 12 right of way issues and planning to immediately address existing safety issues.

The Garfield County School Board takes its responsibility for contributing to the safety of our children very seriously, and we are prepared to do whatever is necessary to reach that goal. We look forward to working cooperatively with the GSENM and FHWA to provide safe transportation of our children to and from school. Please communicate directly with William Weppner (Bill) as the Garfield County Board Member assigned this issue.

Respectfully,



William A. Weppner, Ph.D.
Garfield County School Board Member
P.O. Box 574
Escalante, UT 84726
(435) 616-5800

This letter was sent with the knowledge and approval of the Garfield County School Board.

Board President Barton W. Palmer
Board Vice President Gladys LeFevre
Board Member Mack Oetting
Board Member Jeanne Russo-Whalen
Board Member William A. Weppner, Ph.D.



U.S. Department
Of Transportation
**Federal Highway
Administration**

Utah Division

2520 West 4700 South, Ste. 9A
Salt Lake City, UT 84118-1847

August 15, 2006

File: STP-0012(8)60E

Mr. William A. Weppner, PhD.
Garfield County School Board Member
P.O. Box 574
Escalante, UT 84726

SUBJECT: Project SR-12 Escalante to Boulder City, Utah

Dear Dr. Weppner:

Thank you for your July 26, 2006, letter identifying concerns over proper maintenance of Utah State Highway 12 (SR-12) between Escalante and Boulder, and the need for a timely resolution.

My staff, and the Utah Department of Transportation (UDOT), are well aware of the challenges on SR-12, and have been working to solve both short-term and long-term issues associated with maintenance and safety. A meeting was held on July 11 & 12, 2006, at the Bureau of Land Management Escalante Interagency Office to discuss these issues and develop a course of action to proceed.

Mr. Wade Barney, the UDOT Maintenance Station Supervisor responsible for SR-12, and Mr. Rusty Lee, the Bureau of Land Management (BLM) National Environmental Policy Act (NEPA)/Escalante Station Manager attended that meeting. They agreed to survey the corridor and identify general maintenance activities that could take place immediately. This survey occurred on July 18, 2006, and has resulted in agreement for UDOT to conduct surface treatment activities without having to consult the BLM NEPA/Escalante Station Manager; and to perform shoulder treatments on a case-by-case basis after consultation and agreement with the BLM NEPA/Escalante Station Manager.

On August 7, 2006, I spoke with Mr. Dal Hawks, the UDOT Region 4 Director, concerning SR-12, and he indicated that SR-12 did have unusual right-of-way circumstances that have resulted in deferred maintenance. However, given the nature of the roadway's setting within a National Monument, and the rugged terrain it traverses, it cannot be maintained to the same standard as many other roads in the region. Mr. Hawks assured me that the UDOT is maintaining SR-12 to an appropriate standard, and that if a maintenance condition existed in necessitating immediate attention, it would be taken care of working in collaboration with the BLM NEPA/Escalante Station Manager.

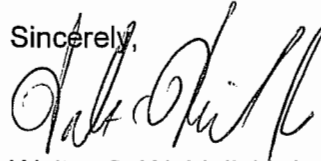


The UDOT is currently applying for the right of way from the BLM in an effort to make maintenance of SR-12 more efficient. As part of the process, the UDOT will complete environmental documentation for each proposed improvement to comply with the National Environmental Policy Act. Once the requested ROW has been obtained, the UDOT will then proceed with specific spot safety improvements along the corridor. These NEPA documents are intended to address and clarify any mitigation required as well as the needs and concerns of the various stakeholders.

The Garfield School District is a very important stakeholder concerning SR-12, and our records indicate that the District has been actively involved with the Context Sensitive Committee. I urge you to continue your involvement to ensure your concerns are considered in any decisions.

Should you require additional assistance concerning your continued involvement, please contact Carlos C. Machado, directly at (801) 963-0078 ext 231, or Monte Aldridge, UDOT Project Manager from Region 4 at (435) 893-4738.

Sincerely,



Walter C. Waidelich, Jr.
Division Administrator

cc: Barton W. Palmer, G.C.D. Board President
Gladys LeFevre, G.C.D. Board Vice-President
Mack Oetting, G.C.D. Board Member
Jeanne Russo-Whalen, G.C.D. Board Member
Dal Hawks, UDOT Region 4 Director
Monte Aldridge, UDOT Region 4 Project Manager
Nancy Jerome, UDOT Region 4 Right-of-Way
Wade Barney, UDOT Region 4 Maintenance
Paul Chapman, BLM Project Coordinator
Carol Kershaw, BLM Realty Specialist
Rusty Lee, BLM NEPA/Escalante Station Manager
Lyle McMillian, UDOT, Right of Way Director
Carlos Bracerias, UDOT, Deputy Director

WCWAIDELICH:dam



Jan Ellen Burton
1340 Gilmer Drive
SLC. UT. 84105

February 20, 2007

Dear Sir:

Highway 12 is my favorite road. Chicago where I grew up had nothing like this. My husband lived on a scenic road in Rhode Island, but it was nothing like this. We take our old friends and relatives along this road every year.

When I read the Utah Sierran and learned the road will be "improved" I was very concerned. However, the article in the paper implies UDOT may be interested in maintaining the integrity of this highway. Certainly it is good for tourism.

I will be brief. There are a couple of scary areas, particularly going south toward Calf Creek campground. I vote the jersey barriers go, and think a rock wall would be better. I understand a highway right of way may need to be obtained. This road is certainly beyond RS2477 status at this time and there is no going back. However, I do not believe the Calf Creek Campground is big enough to support larger vehicles without severely impacting the beauty of the place. I also do not believe widening the road by cutting into the rock would be possible without impacting the scenic splendor of this road.

Please improve the safety of this road without impacting the uniqueness people love.

Thank you,


Jan Ellen Burton

February 20, 2007

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